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CUNNINGHAM DUCT WORK s/h/i/a
CUNNINGHAM DUCT CLEANING CO., INC.
26 Broadway - 28th Floor
New York, New York 10004
(212) 482-0001

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
**IN RE COMBINED WORLD TRADE CENTER
AND LOWER MANHATTAN DISASTER SITE
LITIGATION**
-----X

21 MC 102 (AKH)

LUIS MORAN (AND WIFE, KETTY MORAN),

**DOCKET NO:
08 CV 2243**

Plaintiffs,

-against-

**100 CHURCH, LLC, 120 BROADWAY
CONDOMINIUM (CONDO # 871), 120
BROADWAY HOLDINGS, LLC, 120
BROADWAY PROPERTIES, LLC,
120 BROADWAY LLC., 222 BROADWAY,
LLC, ALAN KASMAN DBA KASCO, AMBIENT
GROUP, INC., AMERICAN EXPRESS BANK,
LTD., AMERICAN EXPRESS COMPANY,
AMERICAN EXPRESS TRAVEL RELATED
SERVICES COMPANY, INC., ANN TAYLOR
STORES CORPORATION, BATTERY PARK CITY
AUTHORITY, BFP ONE LIBERTY PLAZA CO., LLC.,
BFP TOWER C CO., LLC, BFP TOWER C
MM LLC, BLACKMON-MOORING STEAMATIC
CATASTOPHE, INC., d/b/a BMS CAT, BOARD OF
MANAGERS OF THE 120 BROADWAY CONDOMINIUM
(CONDO # 871), BROOKFIELD FINANCIAL
PROPERTIES, INC., BROOKFIELD FINANCIAL
PROPERTIES, LP, BROOKFIELD PARTNERS, LP,
BROOKFIELD PROPERTIES CORPORATION,
BROOKFIELD PROPERTIES HOLDING, INC
CHASE MANHATTAN BANK CORPORATION,**

**NOTICE OF
ADOPTION OF
ANSWER TO MASTER
COMPLAINT**

CITIBANK, NA, CUNNINGHAM DUCT CLEANING CO.,
CUSHMAN & WAKEFIELD, INC., ENVIROTECH
CLEAN AIR, INC., GENERAL RE SERVICES CORP.,
GPS ENVIRONMENTAL CONSULTANTS, INC.,
HILLMAN ENVIRONMENTAL GROUP, LLC
INDOOR ENVIRONMENTAL TECHNOLOGY, INC.,
KASKO RESTORATION SERVICES CO., LAW
ENGINEERING, P.C., LEHMAN BROTHERS,
INC., LEHMAN COMMERCIAL PAPER, INC.,
MERRILL LYNCH & CO., INC., NATIONAL
ASSOCIATION OF SECURITIES DEALERS,
INC., NEW LIBERTY PLAZA LP.,
NEW YORK CITY INDUSTRIAL DEVELOPMENT,
AGENCY, NEW YORK CITY INDUSTRIAL
DEVELOPMENT CORPORATION, NOMURA
HOLDING AMERICA, INC., NOMURA SECURITIES
INTERNATIONAL, INC., ONE LIBERTY PLAZA,
ROYAL AND SUNALLIANCE INSURANCE
GROUP, PLC, SILVERSTEIN PROPERTIES, INC.,
STRUCTURE TONE (UK), INC.,
STRUCTURE TONE GLOBAL SERVICES, INC.,
THE BOARD OF MANAGERS OF ONE LIBERTY
PLAZA CONDOMINIUM (CONDO # 1178),
THE CITY UNIVERSITY OF NEW YORK,
THE ONE LIBERTY PLAZA CONDOMINIUM
(CONDO # 1178), TOSCORP INC.,
TRAMELL CROW COMPANY, TRAMELL
CROW CORPORATE SERVICES, INC.,
TRC ENGINEERS, INC., TUCKER
ANTHONY, INC, UBS FINANCIAL
SERVICES, INC., f/k/a SWISS BANK
CORPORATION, VERIZON NEW YORK,
INC., WESTON SOLUTIONS, INC.,
WFP ONE LIBERTY PLAZA CO., L.P.,
WFP ONE LIBERTY PLAZA CO. GP, CORP.,
WFP RETAIL CO. G.P. CORP., WFP
RETAIL CO. L.P., WFP TOWER A CO.,
L.P., WFP TOWER B CO., G.P. CORP.
WFP TOWER B HOLDING CO. L.P.
WFP TOWER B CO., L.P., WFP TOWER D CO.
G.P. CORP., WFP TOWER D HOLDING CO. I
L.P., WFP TOWER D HOLDING CO., II L.P.,
WFP TOWER D HOLDING I G.P., CORP.,

**WFP TOWER D CO., L.P., WORLD FINANCIAL
PROPERTIES, L.P., and ZAR REALTY
MANAGEMENT CORP., ET AL**

Defendants.

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PLEASE TAKE NOTICE, that defendant **CUNNINGHAM DUCT WORK s/h/i/a CUNNINGHAM DUCT CLEANING CO., INC.** ("CUNNINGHAM"), by its attorneys, RUSSO, KEANE & TONER, LLP, as and for its Response to the allegations set forth in the Complaint by Adoption (Check-Off-Complaint) Related to the Master Complaint filed in the above referenced action, hereby adopt their Answer to Master Complaint dated, August 1, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant, CUNNINGHAM demands judgment dismissing the above captioned caption action as against it, together with its costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
May 5, 2008

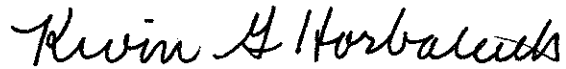
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TO: CHRISTOPHER R. LaPOLA, ESQ.,
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New York, New York 10006
(212) 267-3700

CERTIFICATION OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon the following listed person by placing a copy of the same in the United States mail, postage prepared and properly addressed, this the 5th day of May, 2008.

CHRISTOPHER R. LaPOLA, ESQ.,
WORBY GRONER EDELMAN & NAPOLI BERN, LLP
Attorney for Plaintiffs
LUIS MORAN (AND WIFE, KETTY MORAN),
115 Broadway 12th Floor
New York, New York 10006

A handwritten signature in black ink, reading "Kevin G. Horbatiuk", written over a horizontal line.

KEVIN G. HORBATIUK